

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application of )  
 )  
PUBLIC UTILITIES COMMISSION )  
 )  
Instituting a Proceeding to Investigate the )  
Implementation of Feed-in Tariffs. )  
 )  
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DOCKET NO. 2008-0273

PUBLIC UTILITIES  
COMMISSION

2009 MAR -4 P 1:29

FILED

**ALEXANDER & BALDWIN, INC. through its division  
HAWAIIAN COMMERCIAL & SUGAR COMPANY'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND  
THE CONSUMER ADVOCATE REGARDING THEIR  
OPENING STATEMENT OF POSITION AND PROPOSAL FOR FEED-IN TARIFF  
DESIGN, POLICIES AND PRICING METHODS**

**AND**

**CERTIFICATE OF SERVICE**

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COMMERCIAL & SUGAR COMPANY

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

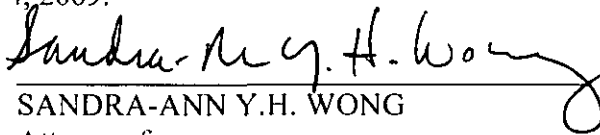
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TARIFF DESIGN, POLICIES AND PRICING METHODS**

Pursuant to the Commission's Order Approving the HECO Companies' Proposed  
Procedural Order, as Modified, filed on January 20, 2009, Alexander & Baldwin, Inc.,  
through its division Hawaiian Commercial & Sugar Company hereby submits the  
following Information Requests to the HECO Companies and the Division of Consumer  
Advocacy's Opening Statement of Position and Proposal for Feed-in Tariff Design,  
Policies and Pricing Methods.

Respectfully submitted.

DATED: Honolulu, Hawaii, March 4, 2009.

  
SANDRA-ANN Y.H. WONG  
Attorney for  
Alexander & Baldwin, Inc. through its  
division Hawaiian Commercial & Sugar  
Company

**DOCKET NO. 2008-0273**

**ALEXANDER & BALDWIN, INC. through its division  
HAWAIIAN COMMERCIAL & SUGAR COMPANY'S  
INFORMATION REQUESTS TO HAWAIIAN ELECTRIC COMPANY AND  
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TARIFF DESIGN, POLICIES AND PRICING METHODS**

**INSTRUCTIONS:**

In order to expedite and facilitate Hawaiian Commercial & Sugar Company's ("HC&S") review and analysis in the above matter, the following is requested:

1. For each response, the HECO Companies and the Consumer Advocate ("HECO/CA") should identify the person who is responsible for preparing the response as well as the witness who will be responsible for sponsoring the response should there be an evidentiary hearing;
2. Should HECO/CA claim that any information is not discoverable for any reason:
  - a. State all claimed privileges and objections to disclosure;
  - b. State all facts and reasons supporting each claimed privilege and objection;
  - c. State under what conditions HECO/CA is willing to permit disclosure to HC&S (e.g. protective agreement, review at business offices, etc.); and
  - d. If HECO/CA claims that a written document or electronic file is not discoverable, besides complying with subparagraphs 2a-c, identify each document or electronic file, or portions thereof, that HECO/CA claims are privileged or will not be disclosed, including the title or subject matter, the date, the author(s) and the addressee(s).

HC&S-IR-7: Does the HECO Companies plan to include FiT generation in its QF-in/QF-out calculation of avoided cost utilizing P-Month, a PC-based production stimulation model?

- a. If yes, will all FiT generation be included in the QF-in run? If not, please explain in detail why not?
- b. If yes, will only as-available FiT generation be included in the QF-out run? Or will both as-available and firm FiT generation be included in the QF-out run. In either case, please explain your reasoning?
- c. If yes, is it expected that additional regulating reserve will be required for each HECO Companies' grid system? If yes, will this lower the rate paid to existing IPPs who are paid the utilities' avoided cost?

CERTIFICATE OF SERVICE

The foregoing Information Requests to Hawaiian Electric Company and the Consumer Advocate regarding their Opening Statement of Position and Proposal for Feed-in Tariff Design, Policies and Pricing Methods were served on the date of filing by hand delivery or electronically transmitted to the following Parties:

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2 Copies  
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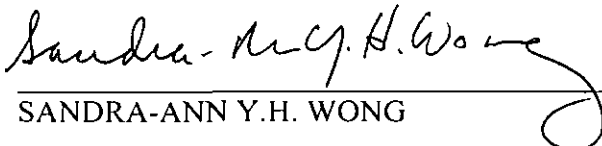
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DATED: Honolulu, Hawaii, March 4, 2009.

  
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